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February 22, 2024

Via Email

Hon. Michael A. Hammer, U.S.M.J.
United States District Court,
District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street Room 4015
Newark, NJ 07101

Re: *Emerson Redevelopers Urban Renewal, LLC v. Borough of Emerson and Mayor Danielle DiPaola*
Docket No.: 2:20-cv-04728

Dear Judge Hammer:

We represent Plaintiffs. We apologize on behalf of the parties for the oversight in the untimely submission of parties' joint proposed amendment to the expert discovery schedule, as discussed with Your Honor at the settlement conference on February 5, 2024. The parties have conferred regarding their respective trial schedules and respectfully request that the Court consider the parties' joint proposed amended schedule to complete the expert depositions and serve and respond to summary judgment motions.

The parties request the following schedule:

Date	Deadline
5/15/24	Completion of all expert depositions.
6/14/24	Any motion for summary judgment to be filed and served.
7/17/24	Opposition to motion for summary judgment to be filed and served.
7/31/24	Reply on motion for summary judgment to be filed and served.

We thank Your Honor for your courtesies in this matter.

Respectfully submitted,

s/Joseph B. Fiorenzo

Joseph B. Fiorenzo

cc: All counsel of record (via CM/ECF)

SO ORDERED

s/Michael A. Hammer

Michael A. Hammer, U.S.M.J.

Date: *2/27/2024*